

# **EXHIBIT**

**15**

**THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Civil Action No. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR ADMISSIONS,  
INC.,

Plaintiff,

v.

UNIVERSITY OF NORTH CAROLINA,  
et al.,

Defendants,

and

LUIS ACOSTA; CHRISTOPHER  
JACKSON on behalf of C.J.; RAMONIA  
JONES on behalf of R.J.; JULIA NIEVES on  
behalf of I.N.; ANGIE & KEVIN MILLS on  
behalf of Q.M.; LAURA ORNELAS;  
CECILIA POLANCO; TAMIKA  
WILLIAMS on behalf of A.J.; and STAR  
WINGATE-BEY,

Defendant-Intervenors.

**DECLARATION OF  
VALERIE NEWSOME HAYES**

Valerie Newsome Hayes, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Valerie Newsome Hayes, I am over 18 years of age, and I am fully competent to make this declaration.
  
2. I was a full-time undergraduate student at UNC-Chapel Hill during the period of 1981 – 1985. While at UNC, my major was Radio, Television and Motion Pictures.

3. I am African American.

4. My parents were not able to attend a four year college and I am the first generation of college graduates from a four year college.

5. UNC-Chapel Hill was my first choice of colleges to attend. I had considered some others schools in North Carolina and Virginia, but after visiting UNC I felt it was the best university for me. The two main reasons for me selecting UNC were the academic reputation of UNC and the feedback I received from former high school classmates who were attending UNC. Their feedback about their experiences on campus was both enlightening and somewhat concerning. The high school that we attended had a very diverse student population and I was “warned” that some of the classes at UNC were not very diverse. However, I was told there were opportunities to meet and connect with other students of color, specifically, other African American students. Additionally, each African American student I talked to mentioned Dean Renwick as a resource “to get to know” to be successful at UNC. Their reassurance about connecting with other African American students and their referral to Dean Renwick helped persuade me to select UNC over other schools, including HBCUs in the surrounding area.

6. My overall experience at UNC was very positive. I was challenged academically, I was exposed to different perspectives, I met new lifetime friends and I experienced a NCAA basketball championship! I was also able to meet several other African American students by connecting with my former high school classmates and intentionally getting involved with organizations that supported the African American student experience.

7. While the vast majority of my experience at UNC was very positive I did have some experiences that did cause me to pause and question my decision to attend UNC. I remember sitting in one class (I think it was a biology class) of about 300 students and scanning the room to see if there were any other students of color. I distinctly remember this as an odd feeling because I grew up in a military town where the schools and classrooms were very diverse and I never felt like “one of the only” students of color. I also remember one particular incident in which I witnessed a physical altercation between a White male student and an African American female student in which racial name calling took place. This incident was mentioned in the school newspaper and several African American students and a few White students (former high school classmates) reached out to me and provided support and encouragement. The case ended up in court and I had to testify. This was one example of some of the racial tension that was present on the campus during my time there.

8. UNC is not only an institute of higher academic learning, it is also a place where students grow as individuals. Part of that growth is exposure to new people with different perspectives. Just as the UNC experience focuses on enriching the whole student, the admissions process should continue to focus on the whole student as well. Considering race as a factor for admissions is a part of considering the whole student. Race is not just the color of a student's skin, it is a component of that student's experiences and perspective. That is why I am advocating that UNC continues to use race as one of the many factors in its holistic approach to reviewing student applicants.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29<sup>th</sup> day of May, 2017.

Valerie Neuwome Hayes